

**From:** [Frederick Tornatore](#)  
**To:** [Leonard Scandura](#)  
**Cc:** [Richard Karrs](#); [Thomas Aguirre](#); [TJ Paskach](#); [Jerod Smeenk](#); [Michael Zembrzusi](#)  
**Subject:** Re: San Joaquin Renewable Woody Biomass to RNG Project  
**Date:** Tuesday, March 2, 2021 9:10:22 AM  
**Attachments:** [SJVAPCD Requested Information Regarding Disaggregation 20210301 .docx](#)  
**Importance:** High

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Leonard:

Attached is the SJR responses to your questions regarding the arrangement at the SJR project site with the electric power provider.

We would still like to have a video meeting to discuss this week if possible.

Thanks,

Fred

On Feb 25, 2021, at 2:51 PM, Frederick Tornatore <[fatoxic@tssconsultants.com](mailto:fatoxic@tssconsultants.com)> wrote:

Leonard:

We are completing our responses and answers to your questions and information requests and would like to have a meeting to discuss. We are hoping you can meet (virtually) next week. Here are our times of availability (all in CA times):

- Tuesday, 3/2
  - 9 – 11 am
  - 12:30-1:30 pm
- Wednesday, 3/3
  - 12 - 1 pm and 2 - 3 pm
- Thursday, 3/4
  - 8 – 11 am
  - 12 –.3 pm

Please let me know which of these times will work for you and I will send out a video meeting invite. We will also send you our responses and answers prior to the meeting for your review.

Thanks,

Fred

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On Feb 2, 2021, at 3:18 PM, Leonard Scandura <[Leonard.Scandura@valleyair.org](mailto:Leonard.Scandura@valleyair.org)> wrote:

Fred –

Thank you for the email and the copy of EPA's 4/30/18 stationary source determination for a landfill gas to energy project that reflects their current position on how to determine common control. While EPA's 4/30/18 determination reflect their current position on an aspect of stationary source determinations, it is the responsibility of the San Joaquin Valley APCD, as part of its NSR and Title V permitting programs, to make stationary source determinations.

As you know, stationary source determinations are fact specific. In order for us to determine if the proposed gasifier and ~ 23 MW IC engine power plant are part of the same or separate stationary sources, we need additional information, as follows:

- an identification of the power provider,
- a detailed description of what entity owns/controls the power provider,
- a detailed description of what entity owns/controls San Joaquin Renewables,
- a detailed description of the relationship between San Joaquin Renewables and power provider,
- an estimate of the percentage of renewable gas produced at the facility that will be directed to the power provider,
- an estimate of the percentage of electricity produced by the power provider that will be directed to the equipment used in the gasification process, and
- an estimate of the percentage of electricity produced at the facility that will be exported.

Separately, to allow us to better understand the source of biomass to be gasified, please provide:

- a detailed description of the types of biomass to be gasified,
- percentages of each type of biomass to be gasified,
- quantities in ton/day and ton/year of each type of biomass to be gasified, and
- the average distance from which biomass materials will be transported to the gasification facility

Thank you for your assistance. Please give me a call with any questions.

Leonard Scandura  
Permit Services Manager  
661-392-5601

[<image001.gif>](#)

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**From:** Frederick Tornatore <[fatoxic@tssconsultants.com](mailto:fatoxic@tssconsultants.com)>

**Sent:** Thursday, January 28, 2021 12:37 PM

**To:** Leonard Scandura <[Leonard.Scandura@valleyair.org](mailto:Leonard.Scandura@valleyair.org)>

**Cc:** Richard Kars <[Richard.Kars@valleyair.org](mailto:Richard.Kars@valleyair.org)>; Thomas Aguirre <[Thomas.Aguirre@valleyair.org](mailto:Thomas.Aguirre@valleyair.org)>;

TJ Paskach <[tpaskach@frontlinebioenergy.com](mailto:tpaskach@frontlinebioenergy.com)>; Jerod Smeenk

<[jsmeenk@frontlinebioenergy.com](mailto:jsmeenk@frontlinebioenergy.com)>; Michael Zembrzuski <[mzembrzuski@frontlinebioenergy.com](mailto:mzembrzuski@frontlinebioenergy.com)>;

Doug Brown <[browndoug@att.net](mailto:browndoug@att.net)>

**Subject:** Re: San Joaquin Renewable Woody Biomass to RNG Project

**Importance:** High

Leonard:

Do you or your staff have any questions for us regarding the letter? We are available to respond.

Thanks,

Fred

On Jan 20, 2021, at 12:12 PM, Frederick Tornatore <[fatoxic@tssconsultants.com](mailto:fatoxic@tssconsultants.com)> wrote:

Leonard:

Per the discussion we had in December, attached is a letter regarding the emissions source aggregation. As you will in the letter and support information, we fully believe that the planned merchant power plant and the San Joaquin Renewable woody biomass conversion to RNG are not aggregated sources for the purposes of air quality permitting and compliance.

Thank you and your staff for your review and concurrence with our finding.

Fred

<Source Aggregation Letter to SJVAPCD 2020119.pdf>

**San Joaquin Renewables  
McFarland, CA Site**

SJVAPCD Requested Information	San Joaquin Renewables Responses	Notes
Identification of the Power Facility owner	American Electric Power (NASDAQ: AEP, <a href="http://www.aep.com">www.aep.com</a> ) NAICS # 221112 - Electric Power Generation	
Identification of SJR	San Joaquin Renewables, Privately held, <a href="http://sjrgas.com">sjrgas.com</a> NAICS # 325120 - Compressed and liquefied industrial gas manufacturing	
Detailed description of what entity owns/controls the Power Facility	AEP is a public company with Governance is described at <a href="https://www.aep.com/investors/governance">https://www.aep.com/investors/governance</a> . None of AEP officers owns any interest in San Joaquin Renewables or Frontline BioEnergy. None of the officers, owners, or board members of San Joaquin Renewables or Frontline owns any stock in nor has any influence in the governance of AEP.	
Detailed description of the relationship between SJR and the Power Facility	<p>The only contractual relationship between the two facilities will be recorded in a power purchase agreement (PPA). It is still not drafted, but terms are being discussed. It is expected that, under the PPA (note these terms are tentative and can be adjusted if needs be, to maintain the required separation of control):</p> <ul style="list-style-type: none"> <li>• AEP will operate (control) their facility in accordance with all applicable OSHA, Fire safety, labor, and other operating regulations, and in accordance with all applicable environmental and conditional use permits;</li> <li>• AEP will operate their power facility efficiently, using the RNG that SJR makes available to AEP, making up any deficit in fuel requirement from the SoCalGas pipeline interconnection on site, through their own gas purchase agreement with SoCalGas or other natural gas provider;</li> <li>• AEP or SoCalGas will maintain a metering station, recording the quantity of RNG that SoCalGas delivers to AEP;</li> </ul>	

	<ul style="list-style-type: none"> <li>• AEP will provide thermal fluid cooling and chilled water cooling pumping services to SJR, meeting agreed targets for thermal fluid delivery temperature and pressure;</li> <li>• San Joaquin Renewables (SJR) will provide AEP with daily notification of how much renewable natural gas SJR will have available for them to use on any given day (RNG scheduling);</li> <li>• SJR will pay AEP an agreed price for power generation availability;</li> <li>• SJR will pay AEP an agreed price for the thermal fluid pumping, cooling services, and chilled water provided to SJR (price TBD);</li> <li>• SJR will charge AEP an agreed price for RNG;</li> <li>• AEP will pay all taxes rightly due by them;</li> <li>• AEP will carry all necessary insurance for liability and power/cooling interruption naming SJR as additional insured;</li> <li>• AEP will comply with all applicable environmental regulations, obtaining all required permits and guaranteeing compliance with all permits;</li> <li>• AEP will hire and maintain its own workforce;</li> <li>• AEP will operate their power facility to maximize efficiency in their use of natural gas fuel;</li> <li>• AEP will operate all necessary emission control devices at their power facility;</li> <li>• AEP will take responsibility for all preventative and active maintenance of their power facility equipment;</li> </ul>	
<p>Estimate of the percentage of renewable gas produced at the facility that will be directed to the power provider</p>	<p>This is anticipated to be 0% up to 25%; however, the AEP power facility can use natural gas from the grid.</p>	
<p>Estimate of the percentage of electricity produced by the power provider that will be directed to the equipment used in</p>	<p>100%, although if needed to be less than 100% the ORC back could be moved back into the SJR scope. If and when necessary, the SJR facility could use electricity from the grid.</p>	

the gasification process		
Estimate of the percentage of electricity produced at the facility that will be exported	When the AEP power facility is exporting electricity, it will be exported to the SJR facility.	
<b>SJVAPCD Requested Information (Feedstock)</b>	<b>San Joaquin Renewables Responses</b>	<b>Notes</b>
Detailed description of the types of biomass to be gasified	The SJR plant will gasify a blend of ag waste (mostly almond orchard removal wood, grapevine, nut, citrus, and stone fruit tree prunings, storm killed trees, and nut shells from huller-shellers).	
Percentages of each type of biomass to be gasified	It is anticipated the blend to be approximately 20-30% nut shell and 70-80% woody ag waste.	
Quantities in ton/day and ton/year of each type of biomass to be gasified	Based on the above percentages, and the size of the SJR facility (900-1200 bone-dry-basis tons/day, 365 days/year) it is expected the blend to be 180-400 tons/day of shells and 720-900 tons/day of woody ag waste (all tonnages are bone-dry basis).	
Average distance from which biomass materials will be transported to the gasification facility	Conservatively it is expected this to be less than 40 miles.	